

STATEMENT OF BASIS (AI No. 142478)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122777 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Fletcher's Poboy Meats, Inc
108 Industrial Drive
St. Joseph, LA 71366

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Molly Hebert

DATE PREPARED: March 21, 2007

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permits - LPDES permit effective date: N/A
LPDES permit expiration date: N/A

D. Date Application Received: November 21, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - Meats Small Processor

This facility cuts and grinds various meats (including beef, pork, and venison) for sale. Wastewater from processing and cleanup is routed to a grease trap and then to a package treatment plant. The facility processes approximately 350 lbs of meat per day.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II - BPJ points to 0 due to facility size (processes 350 lb/d) and discharge volume (<1000 GPD)
3. Wastewater Type: II
4. SIC code: 2013

C. LOCATION - 108 Industrial Drive, St. Joseph, Tensas Parish
Latitude 31° 57' 35", Longitude 91° 16' 24"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: sanitary wastewater and process wastewater from meat cutting operation
Treatment: grease trap and sanitary treatment plant
Location: at the point of discharge from the pipe of the STP located on the east side of the facility, prior to mixing with any other waters
Flow: 600 GPD
Discharge Route: House Lake via local drainage, thence into Little Choctaw Bayou

4. RECEIVING WATERS

STREAM - House Lake via local drainage, thence into Little Choctaw Bayou

BASIN AND SEGMENT - Ouachita River Basin, Segment 081203

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply - Per LAC 33:IX.1111.D, Drinking Water
Supply designations apply only to the listed waterbody, not their tributaries or distributaries. In this case, the designation applies only to Lake Bruin.

5. TMDL STATUS

Subsegment 081203, House Lake via local drainage, thence into Little Choctaw Bayou, is listed on LDEQ's Final 2004 303(d) List as impaired for Nutrients (EPA-Category 5) and Organic Enrichment/Low DO (EPA-Category 5). To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL.

LDEQ interprets its DO standard as a direct indicator of nutrient impacts: "...thus when the LDEQ maintains and protects DO, LDEQ is in effect also limiting and controlling nutrient concentrations and impacts. Therefore, where the DO standard is met, the nutrient standard is also met." (decision document for the Modified Court Ordered 303(d) list, February 29, 2000). Based on this accepted interpretation of water quality standards, de-listings are also proposed for the associated listings of ammonia and nutrients. Therefore, nutrient limitations will not be placed in this permit.

A review of historical data shows that this subsegment is currently meeting DO criterion and therefore, no additional requirements for DO will be placed in this permit. DO concerns will be addressed through BOD₅ limitations established by 40 CFR 432 for the Meat and Poultry Products Point Source Category and the LAG53000.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

7. COMPLIANCE HISTORY/COMMENTS

- A. WQMD – There are no inspections on file as of March 20, 2007.
- B. DMR Review/Excursions – There are no DMRs on file as of March 20, 2007. This is an initial permit.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 081203 of the Ouachita River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge will be from a proposed facility (expansion). LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated August 15, 2006 to determine whether construction-related activities could potentially affect sites or properties on or eligible for listing on the National Register of Historic Places. SHPO's response letter, dated September 20, 2006, stated that the facility as proposed will have no potential effects.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Fletcher's Poboy Meats, Inc

1. **Outfall 001** - sanitary wastewater and process wastewater from meat cutting operation (estimated flow is 600 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (lbs/day)	<u>Reference</u>
Flow	Report:Report	LAG530000
BOD ₅	0.33 : 0.55	40 CFR 432.55; LAG530000
TSS	0.36 : 0.62	40 CFR 432.55; LAG530000
Oil & Grease	0.14 : 0.26	40 CFR 432.55; LAG530000
Fecal Coliform (colonies/100 ml)	--- : 400	LAG530000
pH	6.0 su – 9.0 su (min) (max)	40 CFR 432.3; LAG530000

Treatment: grease trap and sanitary treatment plant

Monitoring Frequency: quarterly – BPJ based on facility size and magnitude of discharge (600 GPD)

Limits Justification: Limits are based on 40 CFR 432 Subpart E – Meat and Poultry Processors, Small Processors New Source Performance Standards and on sanitary wastewater limits established in the Class I Sanitary General Permit (LAG530000). Limits were calculated as a summation of process wastewater limits and sanitary wastewater limits (shown below) using 350 lb/day production and 600 GPD flow. Additionally, while the federal guidelines do not require a fecal Coliform limit for small processors, a standard fecal limit has been included in the permit, as this discharge is composed primarily of sanitary wastewater

Calculated Mass Loading Limits for Process Water

The following mass limits are calculated from the Effluent Limitation Guidelines (ELGs) for the Meat and Poultry Products Point Source (MPPPS) Category, per 40 CFR 432, Subpart E NSPS.

Monthly Average Limits

$$\text{BOD}_5 = (350 \text{ lbs/day}) \times (0.5 \text{ lbs/1000 lbs Live Weight Killed [LWK]}) = 0.18 \text{ lbs/day}$$

$$\text{TSS} = (350 \text{ lbs/day}) \times (0.6 \text{ lbs/1000 lbs LWK}) = 0.21 \text{ lbs/day}$$

$$\text{Oil and Grease} = (350 \text{ lbs/day}) \times (0.25 \text{ lbs/1000 lbs LWK}) = 0.09 \text{ lbs/day}$$

Daily Maximum Limits

$$\text{BOD}_5 = (350 \text{ lbs/day}) \times (1.0 \text{ lbs/1000 lbs LWK}) = 0.35 \text{ lbs/day}$$

$$\text{TSS} = (350 \text{ lbs/day}) \times (1.2 \text{ lbs/1000 lbs LWK}) = 0.42 \text{ lbs/day}$$

$$\text{Oil and Grease} = (350 \text{ lbs/day}) \times (0.5 \text{ lbs/1000 lbs LWK}) = 0.18 \text{ lbs/day}$$

Sanitary Wastewater Limits per LAG530000

Sanitary limits from LAG53000 have been applied to this discharge through BPJ. The limits have been converted from mg/l to lb/day as shown below. Because the facility flow is small and primarily composed of sanitary wastewater, the entire average flow reported in the application has been used to calculate sanitary loadings.

BOD₅

Monthly Average = (30 mg/l)(0.0006 MGD)(8.34) = 0.15 lb/day

Daily Maximum = (45 mg/l)(0.0006MGD)(8.34) = 0.2 lb/day

TSS

Monthly Average = (30 mg/l)(0.0006 MGD)(8.34) = 0.15 lb/day

Daily Maximum = (45 mg/l)(0.0006 MGD)(8.34) = 0.2 lb/day

Oil & Grease

Monthly Average = (15mg/l / 1.5)**(0.0006 MGD)(8.34) = 0.05 lb/day

Daily Maximum = (15 mg/l)(0.0006 MGD)(8.34) = 0.08 lb/day

** Monthly Average concentration limit for Oil & Grease is not included in LAG53000. A monthly average limit has been calculated as shown and has been applied through BPJ.

Summation of BOD₅, TSS, and Oil & Grease Mass Limits for Outfall 001

Since this outfall discharges commingled sanitary and process wastewater, the loadings for each wastewater type have been summed. The sanitary wastewater and process wastewater are routed through the same treatment plant. Sampling prior to commingling of treated wastewaters is not possible.

BOD₅

Monthly Average = 0.18 + 0.15 = **0.33 lb/day**

Daily Maximum = 0.35 + 0.20 = **0.55 lb/day**

TSS

Monthly Average = 0.21 + 0.15 = **0.36 lb/day**

Daily Maximum = 0.42 + 0.20 = **0.62 lb/day**

Oil & Grease

Monthly Average = 0.09 + 0.05 = **0.14 lb/day**

Daily Maximum = 0.18 + 0.08 = **0.26 lb/day**

BPJ Best Professional Judgement
su Standard Units

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENTS

A SWP3 is included in the permit. In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 2092 are considered to have storm water discharges associated with industrial activity. The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).